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9 Attorneys for  
10 Summer Allgood and Guild Mortgage Company

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

MRT ASSETS, LLC, a Nevada limited  
liability company,

Plaintiffs,

vs.

NATIONSTAR MORTGAGE, LLC a form  
and type of entity unknown, SUMMER  
ALLGOOD; GUILD MORTGAGE  
COMPANY, a California Corporation;  
DOES I through X, inclusive

SUMMER ALLGOOD, an individual; and  
GUILD MORTGAGE COMPANY, a  
California Corporation,

Counterclaimants,

vs.

MRT ASSETS, LLC, a Nevada limited  
liability company,

Counterdefendant.

SUMMER ALLGOOD, an individual; and

Case No.: 2: 17-cv-00070-JCM-CWH

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND THE DEADLINE  
FOR SUMMER ALLGOOD AND GUILD  
MORTGAGE COMPANY TO TAKE  
THE DEPOSITIONS OF NATIONSTAR  
MORTGAGE, LLC, AND FEDERAL  
HOME LOAN MORTGAGE  
CORPORATION PER FED. R. CIV. P.  
30(B)(6)**



1 GUILD MORTGAGE COMPANY, a  
2 California Corporation,

3 Crossclaimant,

4 vs.

5 NATIONSTAR MORTGAGE, LLC,

6 Crossdefendant.

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8 SUMMER ALLGOOD, an individual; and  
9 GUILD MORTGAGE COMPANY, a  
California Corporation,

10 Third-Party Plaintiff,

11 vs.

12 FEDERAL HOME LOAN MORTGAGE  
13 CORPORATION, a federally chartered  
corporation,

14 Third-Party Defendant.

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17 Comes now Defendants/Counterclaimants/Crossclaimant/Third-Party Plaintiff, Summer  
18 Allgood (“Allgood”) and Guild Mortgage Company (“Guild”) (“Allgood” and “Guild” collectively  
19 referred to as “Defendants”), and Nationstar Mortgage, LLC (“Nationstar”) and Federal Home  
20 Loan Mortgage Corporation (“Freddie Mac”) by and through the undersigned counsel, who  
21 stipulate and agree as follows, subject to the approval of the Court, as follows:

22 WHEREAS the Defendants noticed the depositions Nationstar and Freddie Mac for August  
23 18, 2017 and then August 11, 2017 due to calendar conflicts.

24 WHEREAS the Defendants have re-noticed the depositions Nationstar and Freddie Mac for  
25 August 21, 2017 which remain on calendar. However, counsel for Nationstar and Freddie Mac  
26 have represented they are not available on August 21, 2017;

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1 WHEREAS counsel for Nationstar and Freddie Mac has indicated that it will be unlikely  
2 that Nationstar and Freddie Mac will be able to sit for deposition during the month of August 2017  
3 due to already scheduled depositions and trials;

4 WHEREAS the discovery deadline for this matter is set for August 22, 2017.

5 WHEREAS Nationstar and Freddie Mac filed a motion to stay discovery [ECF No. 13],  
6 which Defendants joined [ECF No. 14];

7 WHEREAS Nationstar and Freddie Mac requested Defendants re-notice the depositions for  
8 a mutually agreeable date due to unavailability during the month of August, as well as the pending  
9 motion to stay discovery;

10 WHEREAS Nationstar and Freddie Mac agreed that Defendants, in order to accommodate  
11 the schedules of the Nationstar and Freddie Mac and their counsel, may take the depositions of  
12 Nationstar and Freddie Mac on a date beyond the discovery deadline provided that the court denies  
13 the pending motion to stay discovery. If the Court grants the motion to stay discovery, Nationstar  
14 and Freddie Mac agree that Defendants may take the depositions of Nationstar and Freddie Mac  
15 on a mutually agreeable date when and if the stay is lifted;

16 WHEREAS by executing this stipulation, Nationstar and Freddie Mac do not concede the  
17 appropriateness or necessity of the deposition and this stipulation does not preclude Nationstar and  
18 Freddie Mac from seeking a protective order regarding the deposition, topics, location, or date;

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1 NOW THEREFORE, subject to the approval of the Court, Defendants Allgood and Guild  
2 may take the depositions of Nationstar and Freddie Mac beyond the discovery deadline in this  
3 matter, on a mutually agreeable date, time and location.  
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5 Dated: August 15, 2017

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

7 By: /s/ Scott E. Gizer

8 Scott E. Gizer

Attorneys for Summer Allgood and Guild  
Mortgage Company

10 Dated: August 15, 2017

AKERMAN LLP

11 By: /s/ Tenesa Scaturro

12 Tenesa Scaturro, Esq.

Attorneys for Nationstar Mortgage, LLC and  
Federal Home Loan Mortgage Corporation

15 IT IS SO ORDERED:

16   
UNITED STATES MAGISTRATE JUDGE

18 DATED: August 16, 2017  
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